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Attorneys for Plaintiff  
WINE SCOUT INTERNATIONAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Wine Scout International  
Plaintiff,

vs.

Garcia Family Vineyards, Inc.  
Defendant.

CASE NO. CV 08-00858 JF

DECLARATION OF JULIE KOETZNER IN  
SUPPORT OF WINE SCOUT'S REPLY TO  
OPPOSITION TO MOTION FOR  
PRELIMINARY INJUNCTION

I, Julie Koetzner, declare as follows:


1. I am the Director of Business Development for Wine Scout International, doing business as Bounty Hunter ("Wine Scout" or "Plaintiff"). I submit this declaration in support of Wine Scout's Reply to Opposition to Motion for Preliminary Injunction. I have personal knowledge of the facts stated herein and if called to testify upon same could and would do so willingly.

2. Attached hereto as Exhibit 1 are true and correct copies of three (3) invoices Wine Scout received from Icon Design Group, a well-known wine label design firm, for costs incurred

1 in the design of the labels of Wine Scout's proprietary wines POETIC JUSTICE, BLIND  
2 JUSTICE, and FRONTIER JUSTICE. See Declaration of Mark Pope in Support of Motion for  
3 Preliminary Injunction, ¶10, Exh. 11 (includes copies of each of the labels referenced). The  
4 invoices from Icon Design Group for the JUSTICE series of wine labels show that the total cost  
5 for label design was \$5,000 per label.

6 3. On April 3, 2008, I called LeBlanc Design, the design firm which Defendant  
7 alleged to have used to develop the wine label for its BOUNTY HUNTER brand wine, to inquire  
8 about LeBlanc Design's standard costs in designing a wine label. See Declaration of Mark Garcia  
9 in Opposition to Motion for Preliminary Injunction, ¶6. I was informed that, on average, a  
10 complete wine label can be designed by LeBlanc Design for \$5,000, including design,  
11 compliance, and printing, although the costs for a complete label design can be as low as \$3,000.  
12

13 I declare under penalty of perjury under the laws of the United States that the foregoing is  
14 true and correct. Executed this 4 day of April, 2008, at Napa, California.

15  
16   
17 JULIE KOETZNER  
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DP&amp;F

DICKENSON, PEATMAN & FOGARTY  
A Professional Law Corporation

## **Exhibit 1**

# ICON DESIGN GROUP

A Full Service Agency Specializing in Package Design & Image Development

TEL (707) 252-6666  
FAX (707) 252-6742

Bounty Hunter Rare Wine & Provisions  
975 First Street  
Napa CA 94559

January 18, 2006

## INVOICE

#011806

Justice Series

Packaga Design

Phase One \$5,000.00

Thank you

Jeffrey Caldewey

COMPLETED

Please make check payable to:  
Jeffrey Caldewey  
7 Fern Ave.  
Belvedere, CA 94920

ok rf

ICON  
DESIGN GROUP

A Full Service Agency Specializing in Package Design & Image Development

TEL (707) 252-6666  
FAX (707) 252-6742

Bounty Hunter Rare Wine & Provisions  
975 First Street  
Napa CA 94559

March 16, 2006

INVOICE

#031606

Justice Series

Package Design

Phase Two \$5,000.00

Thank you,

Jeffrey Caldewey

COMPLETED

Please make check payable to:  
Jeffrey Caldewey  
7 Fern Ave.  
Belvedere, CA 94920

# ICON

DESIGN GROUP

A Full Service Agency Specializing in Package Design & Image Development

TEL (707) 252-6666  
FAX (707) 252-6742

Bounty Hunter Rare Wine & Provisions  
975 First Street  
Napa CA 94559

April 20, 2006

## INVOICE

#042006

**COMPLETED**

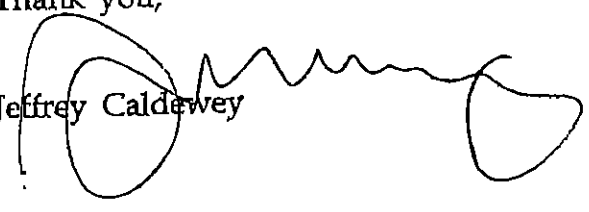
Justice Series

Package Design

Phase Three          \$5,000.00

Thank you,

Jeffrey Caldewey



Please make check payable to:  
Jeffrey Caldewey  
7 Fern Ave.  
Belvedere, CA 94920